

PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

March 26, 1996

RECEIVED

AGUW-SEATTLE

Ash Grove Cement Company
c/o Gerald Brown, Manager - Safety & Environment
3801 East Marginal Way S
Seattle, WA 98134

Dear Mr. Brown:

Ash Grove Cement Company
Application for Relief (Remission or Mitigation)
Notice and Order of Civil Penalty No. 8311

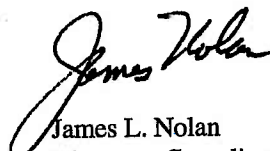
This is to acknowledge receipt by this Agency of the aforementioned Application for Remission or Mitigation on March 21, 1996. The appeal process is suspended until the Agency responds to your application.

The Application will be evaluated pursuant to the requirement of Section 3.11(c) of PSAPCA's Regulation I that provides:

"Upon receipt of the application, the Control Officer shall remit or mitigate the penalty only upon a demonstration by the requestor of extraordinary circumstances such as the presence of information or factors not considered in setting the original penalty."

A Notice of Disposition on the Application for Relief from Penalty will be forthcoming. Thank you.

Very truly yours,


James L. Nolan
Director - Compliance

JLN/kes

cc: Laurie Halvorson, Agency Counsel
Accounting
Rosemary Busterna, Lead Inspector
Melissa McAfee, Inspector

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
R.C. Johnson, Councilman, Snohomish County
Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma
Norman B. Rice, Mayor, Seattle
Doug Sutherland, Pierce County Executive

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

March 19, 1996

Mr. James Nolan
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500 Seattle, WA. 98101-2038

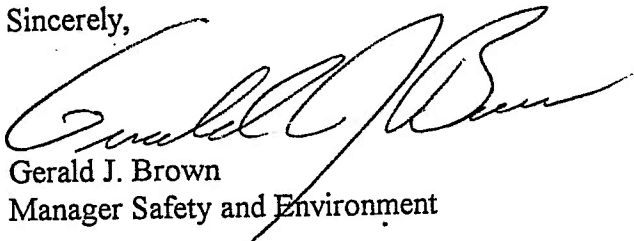
Re: Request for "Mitigation"
NOTICE AND ORDER OF CIVIL PENALTY No. 8311

Dear Mr. Nolan:

Ash Grove Cement Company is seeking mitigation of Notice and Order of Civil No. 8311. We request that PSAPCA consider the following:

1. The clinker shed was completely enclosed several years ago for the expressed purpose of dust control. We have now completed additional measures in an attempt to eliminate small emission from points that are more difficult to control. These actions included sealing areas such as small openings at wall and roof joints and wall penetrations where small emissions of dust may originate. The roof monitor where the conveyer penetrates into the building has been sealed from the lower portion of the building by the installation of solid flooring and strip curtains around the stairwell. PSAPCA should recognize and promote efforts made to further reduce emissions.
2. Resolution of Notice and Order of Civil No. 8311 should encompass NOV #34406 issued 2/20/96, and be included in the settlement of other penalty notices currently under discussion with PSAPCA.

Sincerely,



Gerald J. Brown
Manager Safety and Environment

Copy: HV
NF
DH

PUGET SOUND AIR POLLUTION CONTROL AGENCY
110 Union Street, Suite 500
Seattle, WA 98101

Facility: ASH GROVE CEMENT COMPANY (E. MARG.) Reg #: 11889

Inspection Report: 12/20/95 I was driving with RGB on 99 South by the Ash Grove facility at 0821 when she reported that she saw dust emissions from the facility. I drove the car to a position just north of the plant and observed heavy dust emissions from the roof of the clinker storage shed building. Emissions were noted on the west and east ends of the roof of the building as well as near the monitor on the roof. We took photographs of the emissions.

At 9:15 a.m. RGB and I identified ourselves to the receptionist at Ash Grove and asked to see Mr. Brown. She informed us that he was not in the office and called Mr. Nate Fernow, Asst. Plant Manager. We introduced ourselves to Mr. Fernow wearing our ID badges and gave him our business cards.

Mr. Fernow informed us that the G-cooler baghouse had a bag break and it was down while the bag was being plugged off.

We described the dust emissions that we observed, and he identified the building as the clinker storage shed. He said it is an old building from the 1920's that is used to store clinker on site. Clinker is normally stored in the clinker silos, but Mr. Fernow said that about once a year, overflow clinker is transported from the clinker silos to the storage shed.

We walked out of the office and observed dust emissions from the G-cooler area where the baghouse was down for repair. Mr. Fernow said that the operator planned that it would only take about 40 minutes to plug off the bag and get the baghouse back on line. Order of Approval # 5730 Condition 5D requires that the baghouse be repaired within 24 hours.

Mr. Fernow took us to the northwest side of the plant to look at the clinker storage shed building. He opened the door to take us inside the building. We observed a thick haze of dust in the building air. We told him we did not think it would be safe to enter with so much dust in the air and that we could conduct our investigation by looking at the roof and dust emission points. Mr. Fernow said that the dust is caused by freefall of the clinker from the conveyor to the floor of the building (about a 35 to 40 foot drop) or to whatever level the clinker storage pile exists. He said the building may contain 35,000 tons of clinker.

Mr. Fernow led us on the walkways along the conveyor to reach the building roof. We noticed accumulation of dust on the grating and adjacent conveyor structure. Some of the material was loosened as we walked near or over it, while some material was caked up.

M. M. C. 12/27/95

AGCS2M001255

Mr. Fernow said that the clinker conveyor was running and the storage shed was about 50% full. He said that all doors to the building are kept closed during filling, however he believes a draft coming in through the bottom of the building carries material upward through openings in the roof. He called this a "stack effect" and said that it is due to differences in temperature. He said the clinker temperature is about 180 degrees F. He said that since the clinker silos have no openings in the bottom, they do not have this same dusting problem.

Walked onto the clinker shed building roof. Observed dust emissions emanating from the east end of the building and also from conveying equipment at the south end of the building. Walked over to the east end of the roof and observed that dust emissions were actually coming from the east side of the building and lofting over the roof rather than coming from the top of the roof. He said that holes in the side of the building would exist for power cables. Walked down to the ground and observed the east side of the clinker shed building. Noted some fallout on the side of the building along the edge of the roof.

Went to Ash Grove office and read and discussed Regulation I Sections 9.15 (a), (b), (c), and (d). Explained that we had observed violations of Regulation I Section 9.15 (a) and (c) and issued NOV 33765.

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Cert. Mail No. _____

No. **33765**

9:36-9:45 a.m.

NOTICE OF VIOLATION

Date of Violation: 12-20, 19 95

at 8:21-8:33 a.m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Gerald Brown, Safety/Environmental Manager</u> <u>Nate Fernow, Asst Plant Manager</u>	
Location of Violation (Address) <u>3801 E. Marginal Way S</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 6.09(b) Failure to meet conditions of an Order of Approval.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.04 Particulate matter deposited in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☒ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☒ Section 9.15(b) Operation of vehicle on paved public roadway with dirt/mud/debris on undercarriage (track out) or load spillage.
- ☒ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Section _____

☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION Emissions of dust from clinker storage shed building

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By M. McGee

12/20/95/1030
Date/Time

Received By [Signature]
Signing this Notice is not an admission of guilt

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

January 2, 1996

Ms. Melissa McAfee,
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500 Seattle, WA. 98101-2038

Re: Notice of Violation #33765

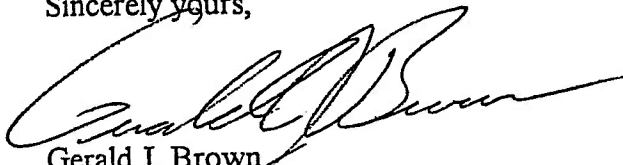
Dear Ms. McAfee,

PSAPCA's Notice of Violation #33765 requested a report from Ash Grove on proposed actions to be taken to stop dust emissions from the clinker storage shed building.

Actions to plug openings in the clinker shed storage building began on 12/28. We expect to complete this project next week. Openings discovered after that time will be plugged as soon as possible.

Please call me if I can be of further assistance.

Sincerely yours,



Gerald J. Brown
Manager, Safety and Environment

cc: HV
NF
DH